

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	
)	Criminal No. 24-cr-10270-RGS
SAM BHAMBHANI and)	
MAXIM TESLENKO,)	
)	
Defendants.)	

JOINT STATUS MEMORANDUM

The defendant, with the assent of the government, hereby submits this memorandum addressing Local Rule 116.5(b). The parties have reviewed this memorandum and agree to its contents.

In light of this memorandum, the parties respectfully ask that the February 25, 2025 interim status conference be cancelled, and that the Court schedule an interim status conference at a time convenient for the Court in approximately 30 days

I. Automatic Discovery and Pending Discovery Requests.

The government has produced automatic discovery to the defendant, who is in the process of reviewing that discovery.

II. Timing of Additional Discovery to be Produced.

The government will provide discovery in response to any future request(s) according to the Local Rules and the Federal Rules of Criminal Procedure, including any supplemental discovery if additional materials are obtained.

III. Timing of Additional Discovery Requests.

The defendant remains in the process of reviewing the initial discovery. He anticipates being able to make requests for additional discovery (if there are any) within an additional 30 days. The discovery in the case was provided in a variety of digital formats and has required counsel for the defendant to obtain specialized software to review it. The process of learning to work with this specialized software took longer than anticipated. Counsel now projects an additional thirty days will be sufficient to develop additional discovery requests.

IV. Protective Orders.

At this time, the parties are not seeking any protective orders to prevent the disclosure or dissemination of sensitive information concerning victims, witnesses, defendants, or law enforcement sources or techniques. The parties reserve the right to seek such orders in the future, should the need arise.

V. Pretrial Motions Under FRCP 12(b).

The defendant requires an additional 30 days to determine whether he will file any motions under Fed. R. Crim. P. 12(b).

VI. Timing of Expert Disclosures.

The parties propose that the government's expert disclosures, if any, be due 45 days before trial and that the defendant's expert disclosures, if any, be due 21 days before trial.

VII. Defenses of Insanity, Public Authority, or Alibi.

The defendant will file notice in accordance with the schedule for pretrial motions for any defenses of insanity, public authority, or alibi, as required by Fed. R. Crim. P. 12.2-12.3.

VIII. Speedy Trial Calculations.

The parties agree that the time between February 25, 2025 and the next status conference should be excluded because the defendant is continuing to review discovery. This period, therefore, constitutes “the reasonable time necessary for effective preparation, taking into account the exercise of due diligence,” 18 U.S.C. § 3161(h)(7)(B)(iv), and the parties request that this Court find that the ends of justice served by excluding the period of this continuance outweigh the best interest of the public and the defendant in a speedy trial, pursuant to 18 U.S.C. § 3161(h)(7)(A).

IX. Status of Plea Discussions and Length of Trial.

The parties are currently unable to estimate the length of any trial.

X. Timing of Further Status Conferences.

The parties request that the February 25, 2025 status conference be cancelled, and that the Court schedule an interim status conference at a time convenient for the Court in approximately 30 days. Counsel for the government is unavailable during the week of March 17, 2025.

Respectfully submitted,

SAM BHAMBANHI

By his attorney:

/s/ Ian Gold

Ian Gold

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Dated: February 21, 2025

CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and that paper copies will be sent to those indicated as non-registered participants on this date.

/s/ Ian Gold
Ian Gold

Dated: February 21, 2025